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8 UNITED STATES BANKRUPTCY COURT
9 DISTRICT OF ARIZONA

10 In re:) Chapter: 13
11) Case No. 2:20-bk-01580-EPB
12)
13 KUSHUNE DENISE ALLEN,)
14)
15 Debtor) MOTION FOR ACCELERATED
16) HEARING ON MOTION TO CONTINUE
17) AUTOMATIC STAY
18)
19)
20)
21)
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25)

26 COMES NOW, Debtor KUSHUNE DENISE ALLEN (“Debtor”) by and through counsel
27 undersigned and hereby moves this Honorable Court for an accelerated hearing on the Motion
28 for Extension of Stay filed the 4th of March , 2020 for the reason that 11 USC §362(c)(3)(B)
29 requires that notice and hearing be completed before the expiration of thirty(30) days after the
30 filing of Debtor’s Chapter 13 Case continue the automatic stay in her bankruptcy as to all
31 creditors. This Motion is supported by the

32 RESPECTFULLY SUBMITTED this 5th day of March, 2020

33 /s/ Tom McAvity
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39 Debtor’s Motion to Expedite

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4 **CERTIFICATE OF SERVICE**

5 This is to certify that the foregoing was submitted on March 5th , 2020 in the United States
6 Bankruptcy Court for filing and transmittal of notice of electronic filing to the United States Trustee,
7 the Chapter 13 Trustee and the ECF registrants appearing in this case.

8 By: /s/ Tom McAvity
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